



STATE OF MAINE

Department of Environmental Protection

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COMMISSIONER

May 21, 1991

Mr. James Shafer
Dept. of the Navy, Northern Division
Naval Facilities Engineering Command
Building 77-L
Philadelphia Naval Shipyard
Philadelphia, PA 19112-5094

RE: State Requirements for Off-Gas Treatment; Focused
Feasibility Study Sites 1 & 3 Naval Air Station
Brunswick

Dear Mr. Shafer:

As you have noted in the Maine Department of Environmental Protection comments regarding the Focused Feasibility Study for Sites 1 & 3, the MEDEP requires a combination of air stripping remediation with an off-gas treatment in order to avoid transferring contamination between media.

For remedial purposes, the Department utilizes risk based guidelines developed by the State Toxicologist Office of the Department of Human Services (DHS) to establish maximum allowable emissions from off-gas treatment of contaminated ground water. A copy of Maine's Interim Ambient Air Guidelines has been enclosed for your information. The estimates, depending upon contaminant and averaging time are based on ceiling values, TLV's, STEL's or other guidance assessment devices. Typically, a contaminant guideline is based upon TLV/60 for non-carcinogens and TLV/300 for carcinogens.

Utilizing the ACGIH-TLV/300, the ambient air guideline would limit vinyl chloride emissions to 43 ug/m^3 . No guideline exists for 1,2 dichloroethylene.

In addition, Section 584 of 38 M.R.S.A. prohibits any person from discharging contaminants into the ambient air in such a manner that ambient air quality standards or emission standards are violated. MEDEP, Bureau of Air Quality Control Regulations, Chapter 110, limits the maximum total hydrocarbon concentration for any 3 hour period at any facility. This limit shall not exceed 160 ug/m^3 .

Furthermore, pursuant to 38 M.R.S.A. Section 585, by way of MEDEP, Bureau of Air Quality Control Regulations Chapter 115, VOC emissions from any off gas venting are limited. Venting procedures at NASB can be limited to 10 pounds/hour or 100 pounds/day on a facility wide basis. The Department considers NASB to be a single facility. The sum of individual treatment operations can thus be limited to a maximum of 10 pounds/hour or 100 pounds/day as set forth in Chapter 115.

Due to the Department's interest in protecting public health and safety, the MEDEP believes that it is important that the risk based guidelines established by DHS are not exceeded. The Department cannot support a remedy that does not meet DHS guidelines.

If you need further clarification please contact me at (207) 289-2651..

Sincerely,



Ted Wolfe
Division of Site Investigation and Remediation
Bureau of Hazardous Materials and Solid Waste Control

cc: Mike Barden, MEDEP
Meghan Cassidy, EPA
Eileen Curry, NASB
Mel Dickenson, E.C. Jordan/ABB Environmental
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